

1 MONTGOMERY Y. PAEK, ESQ.

2 Nevada Bar # 10176

3 ETHAN D. THOMAS, ESQ.

4 Nevada Bar # 12874

5 EMIL S. KIM, ESQ.

6 Nevada Bar # 14894

7 ANDREW S. CLARK, ESQ.

8 Nevada Bar # 14854

9 LITTLER MENDELSON, P.C.

10 3960 Howard Hughes Parkway

Suite 300

11 Las Vegas, NV 89169-5937

12 Telephone: 702.862.8800

13 Fax No.: 702.862.8811

14 Email: mpaek@littler.com

15 Email: edthomas@littler.com

16 Email: ekim@littler.com

17 Email: asclark@littler.com

18 *Attorneys for Defendant*

19 CITY OF HENDERSON

20 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

21 KELLY WOODBURN, THOMAS
22 WOODBURN, and JOSHUA
23 RODRIGUEZ, individually and on behalf
24 of all others similarly situated,

25 Plaintiffs,

26 vs.

27 CITY OF HENDERSON; DOES I through
28 V, inclusive; and ROE CORPORATIONS
I through V, inclusive,

Defendants.

Case No. 2:19-cv-01488-CDS-VCF

**STIPULATION AND PROPOSED ORDER TO
CONTINUE DATE OF HEARING ON
DEFENDANT'S MOTION TO COMPEL
DISCOVERY RESPONSES (ECF NO. 166)
AND DEFENDANT'S MOTION FOR LEAVE
TO FILE EXCESS PAGES (ECF NO. 168)**

(FIRST REQUEST)

1 Plaintiffs Kelly Woodburn, Thomas Woodburn, and Joshua Rodriguez (“Plaintiffs”) and
2 Defendant CITY OF HENDERSON (“Defendant”), by and through their respective attorneys of
3 record, hereby stipulate and agree to continue the date for the hearing on Defendant’s Motion to
4 Compel Discovery Responses (ECF No. 166) and Motion for Leave to File Excess Pages (ECF No.
5 168) currently scheduled for April 26, 2023, at 2:00 p.m.

6 The parties request a continued date for the hearing because counsel for Plaintiffs, Brian
7 Blankenship, is taking a deposition in another lawsuit on April 26, 2023, which cannot be rescheduled.
8 Furthermore, other attorneys at Plaintiffs’ representative law firm, Claggett & Sykes, are also
9 unavailable as they are participating in depositions on the afternoon of April 26, 2023.

10 Accordingly, the Parties propose that the hearing be continued to the following **Wednesday,**
11 **May 3, 2023.** Alternatively, should this requested date not fit within the Court’s schedule, the Parties
12 propose the following alternative dates and times: May 5, 2023, May 9, 2023, or May 11, 2023.

13 ///

14 ///

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1.

1 This extension is sought in good faith and not for the purpose of undue delay.
2
3

Dated: April 21, 2023

4 CLAGGETT & SYKES LAW FIRM

5 By: /s/ Brian Blankenship

SEAN K. CLAGGETT, ESQ.
BRIAN BLANKENSHIP, ESQ.
SCOTT E. LUNDY, ESQ.

6
7
8 *Attorneys for Plaintiffs*

KELLY WOODBURN, THOMAS
WOODBURN, AND JOSHUA
RODRIGUEZ

Dated: April 21, 2023

LITTLER MENDELSON, P.C.

By: /s/ Emil S. Kim

MONTGOMERY Y. PAEK, ESQ.
ETHAN D. THOMAS, ESQ.
EMIL S. KIM, ESQ.
ANDREW S. CLARK, ESQ.

9
10
11 *Attorneys for Defendant*

CITY OF HENDERSON

ORDER

12 **IT IS SO ORDERED.**

13 April 24

Dated: _____, 2023.



14
15 UNITED STATES MAGISTRATE JUDGE

16
17 4881-2425-4303.1 / 080828-1020